

**To:** "Robert Law" [rlaw@demaximis.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Stephanie Vaughn/OU=R2/O=USEPA/C=US  
**Sent:** Fri 10/5/2012 2:49:52 PM  
**Subject:** Re: Fw: Revised HV CWCM QAPP....

How very gracious of you : )

From: "Robert Law" <rlaw@demaximis.com>  
To: Stephanie Vaughn/R2/USEPA/US@EPA  
Date: 10/05/2012 10:46 AM  
Subject: Re: Fw: Revised HV CWCM QAPP....

I'll give them my camera.....

>>> Stephanie Vaughn <Vaughn.Stephania@epamail.epa.gov> 10/5/2012 10:08 AM >>>  
Hi Rob,

My apologies -- I inadvertently left off a few comments on the revised HV CWCM QAPP. Here are the rest...please let us know if you have any questions.

Thanks,  
Stephanie

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Comment #13a - In addition to preparing and referencing a Technical Memorandum on partition coefficient development, text should be added to the QAPP to describe that the partition coefficients will be site-specific, and operationally defined by the 0.7 um filter and potential limitations of the PUF cartridge with respect to the capture of colloid-phase contaminants.

Comment #29 - Coordination will be required between EPA and the CPG regarding the analysis of the second PUF cartridge in the EPA split samples.

Comment #58 - The use of a PCB/DX spike solution, equilibrated in water, to prepare a PE sample for the dissolved phase portion of the analysis should be evaluated.

Comment #90 - EPA disagrees with the response to this comment. The QAPP should be modified to designate the field camera as a mandatory and not optional piece of equipment.

----- Forwarded by Stephanie Vaughn/R2/USEPA/US on 10/05/2012 10:03 AM -----

From: Stephanie Vaughn/R2/USEPA/US  
To: rlaw@demaximis.com  
Cc: Eugenia Naranjo/R2/USEPA/US@EPA, BudneySL@cdm.com, lwarner@louisberger.com,

aaccardidey@louisberger.com, Elizabeth.A.Buckrucker@usace.army.mil  
Date: 10/04/2012 11:25 AM  
Subject: Revised HV CWCM QAPP....

Hi Rob,

EPA reviewed the HV CWCM QAPP, Revision 1, dated September 2012. The following comments were not adequately addressed in the revised QAPP. Please let us know if you have any questions, and address these comments in a revised QAPP.

Thanks,  
Stephanie

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Comment 8 -- the language suggested in the RTC should be replaced with the following:

"Partitioning data developed as part of the CARP program include only a limited number of samples in the Lower Passaic River and Newark Bay (especially for dioxins and furans) and the partition coefficients derived from these data are characterized by substantial variability in both space and time. Additional data are needed to increase the confidence in site specific partition coefficients and determine if they vary spatially."

Comment 28 -- It would be helpful if the same information were added to page 3 of 5 on Worksheet 12.

Comment 31 -- Additional detail should be provided regarding the preparation of the solid phase PE sample (for example, will the PE sample be prepared with a filter media and the coagulant?). In addition, Comment 31a requested that Worksheets 31 and 32 clarify that PE samples were only being analyzed for the solid phase portion of the sample. The requested addition was not incorporated.

Comment 36. This comment has not been addressed on Worksheet 12 (the addition of the QC standard to the PCB analytical tables).

Comment 41 -- The phrase "Measurement Performance Criteria" was not added to the DQI column for the Method Blank in the PCDDs/Fs portions of Worksheet 12, as requested.

Comment 42 -- It doesn't appear that clarifying language regarding the use of the EDLs was added, although the exception for 2,3,7,8-TCDD was removed.

Comment 45 -- This was changed to glass wool throughout, no 25 um cellulose will be used.

Comment 66 -- Worksheet 28 hasn't been completely updated to be consistent with the changes to Worksheet 12. For example, in Worksheet 28, on Page 6 of 19, the static spike recovery criterion for the PCB PUF sample is still listed as 50-150% rather than 75-125% as revised in Worksheet 12 according to EPA comment 39 and the CPG's response. Worksheet 28 should be fully reviewed for consistency with the comments on Worksheet 12.

Comment 87 -- SOP LPR-FI-04 still includes comments such as "This SOP....is restricted to standard or "small volume" sample collection" (see last sentence of Section 1.1.) The SOP text needs to be updated better to reflect large volume sampling and avoid confusion. The revised wording is handled a bit better for SOP FI-06, which states that "this SOP is restricted to small volume sampling of metals. The clean hands techniques in this SOP are also applicable to high volume (HV) sampling of hydrophobic organic compounds per SOP SW-19."

Comment on the revised analytical SOP for the PUF and filter preparation -- Step 4 under the "High Volume

Sampling Specific Additions to SOP", page 5 of 5 of the Addendum, seems to be out of place. Please review the sample preparation procedure and revise or clarify this step, because it is the same step as number 2 above.